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US DISTRICT COURT E.D.N.Y.

★ AUG 24 2017 ★

BROOKLYN OFFICE

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

Kenneth Pearson  
Noble Kenneth Pearson Bey

Plaintiff,

[Insert full name of plaintiff/prisoner]

**CV 17-5088**

**CIVIL RIGHTS COMPLAINT**  
42 U.S.C. § 1983

JURY DEMAND

YES \_\_\_\_\_ NO \_\_\_\_\_

against

Chief Stokes  
Captain Horton  
Captain Stephens  
Captain Williams  
Captain Lewis  
Officer Hicea  
Defendant(s).

**DONNELLY, J.**

**GOLD, M.J.**

[Insert full name(s) of defendant(s). If you need additional space, please write "see attached" and insert a separate page with the full names of the additional defendants. The names listed above must be identical to those listed in Part I]

I. Parties: (In item A below, place your name in the first blank and provide your present address and telephone number. Do the same for additional plaintiffs, if any.)

A. Name of plaintiff

Kenneth Pearson, Noble Kenneth Pearson Bey

If you are incarcerated, provide the name of the facility and address:

Prisoner ID Number: 1131700468

If you are not incarcerated, provide your current address:

OBCC 1600 Hazen Street  
East Elmhurst, New York 11370

Telephone Number: \_\_\_\_\_

B. List all defendants. You must provide the full names of each defendant and the addresses at which each defendant may be served. The defendants listed here must match the defendants named in the caption on page 1.

Defendant No. 1

Cheif Stokes

Full Name

Cheif Correction Officer

Job Title

OBCC 1600 Hazen Street  
EAST ELMHURST New York 11370

Address

Defendant No. 2

Captain Hoston Badge #679

Full Name

Correction Officer

Job Title

OBCC 1600 Hazen Street  
EAST Elmhurst, New York 11370

Address

Defendant No. 3

Captain Stephens

Full Name

Correction Officer

Job Title

OBCC 1600 Hazen Street

East Elmhurst, New York 11370  
Address

Defendant No. 4

Captain Lewis

Full Name

Correction Officer

Job Title

OBCC 1600 Hazen Street

East Elmhurst, New York 11370  
Address

Defendant No. 5

Captain Williams

Full Name

Correction Officer

Job Title

OBCC 1600 Hazen Street

East Elmhurst, New York 11370  
Address

II. Statement of Claim:

(State briefly and concisely, the facts of your case. Include the date(s) of the event(s) alleged as well as the location where the events occurred. Include the names of each defendant and state how each person named was involved in the event you are claiming violated your rights. You need not give any legal arguments or cite to cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. You may use additional 8 ½ by 11 sheets of paper as necessary.)

Where did the events giving rise to your claim(s) occur?

In the Corridor  
of lower and bumper on the way back  
from the mess hall.

When did the events happen? (include approximate time and date)

On April 7,  
2017

Facts: (what happened?) On April 7, 2017 2,000 hrs. I was walking in the hallway coming from the Messhall, when I was called by Officer Green and was told to go and see the Captain, Captain Hokton head of Security for OBC. I was then surrounded by at least 5 more Correction officer and was told to take off my IEL and if I didn't I would be restrained by the Officers surrounding me. Under duress and coercion I was force to go to Intake. I told the Officers on scene I Moroccan Descendant, Moorish American and this is my Religious Nation Head Dress pursuant to the Trust of Moorish Science Temple of America - see Attached Pages

II.A. Injuries. If you are claiming injuries as a result of the events you are complaining about, describe your injuries and state what medical treatment you required. Was medical treatment received?

Document # 10105905 I was then told that I can't wear it in here because D.O.C. doesn't recognize M.O.R.S as a Religious Organization and the Order came from Chief Stokes to take the Fez from me at that time. I was then taken to intake and Correction Officer Alicea Badge # 7594 @ 2000 hrs. took my Fez and gave me a property receipt. I spoke to Deputy Violentus several times after that to get back my Fez, I also spoke to Captain Williams, Captain Lewis, Captain Stephens. In regards to getting my Fez Back and was told several times by Deputy Violentus that I would get it back but I noticed was getting the run around from Captain Horton and Deputy Violentus still this day they've not started M.O.R.S Temple for M.O.R.S, and I have not received my Fez. According to the First Amendment of the United States Constitution my Religious Rights have been violated and also my Sixth Amendment Rights have been violated also.

III. Relief: State what relief you are seeking if you prevail on your complaint.

I want Al-Moroccan descendants to be recognized as a Religious Organization, I want to be rewarded punitive damage in the amount of \$100,000,000.00, 1 hundred million dollars for Religious Persecution for denying Moors Religious Services and the removal of my fez. According to U.S. States 1<sup>st</sup> Amendment of Congress of 1791.

I declare under penalty of perjury that on \_\_\_\_\_, I delivered this  
(date)  
complaint to prison authorities at \_\_\_\_\_ to be mailed to the United  
(name of prison)  
States District Court for the Eastern District of New York.

I declare under penalty of perjury that the foregoing is true and correct.

Dated:

8/20/2017

Signature of Plaintiff

Dr. Kenneth Pearson Bey

Name of Prison Facility or Address if not incarcerated

Rikers Island OBC

1600 Hazen Street

EAST Elmhurst

New York, 11370

Address

1131700468

Prisoner ID#